

THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Carla Renee Baynard, : Chapter 13  
Debtor : No. : 17-15150-amc

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**Hearing to be Held:**

**Date: January 6, 2021**

**Time: 10:00 A.M.**

**Place: United States Bankruptcy Court**

**Courtroom #4, Second Floor**

**Robert N.C. Nix, Sr. Federal Courthouse**

**900 Market Street**

**Philadelphia, PA 19107**

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**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

Carla Renee Baynard, Debtor, by and through undersigned counsel, has filed a Motion to Modify the Chapter 13 Plan (Post-Confirmation).

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT AN ATTORNEY.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before December 21, 2020 you or your attorney must do ALL of the following:

(a). file an answer explaining your position at:

**United States Bankruptcy Court  
Eastern District of Pennsylvania  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107**

(b). If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and mail a copy to movant:

Joseph Quinn, Esquire  
Ross, Quinn & Ploppert, P.C.  
192 S. Hanover Street, Suite 101  
Pottstown, PA 19464

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief in the motion.

3. A hearing on the motion is scheduled to be held before Ashely M Chan, United States Bankruptcy Judge on January 6, 2021 at 10:00 A.M., in:

**Courtroom #4, Second Floor  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street  
Philadelphia, PA 19107**

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you are on the Clerk's Service List or if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the bankruptcy clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

**ROSS, QUINN & PLOPPERT, P.C.**

By: /s/ Joseph Quinn  
Joseph Quinn, Esquire  
Attorney I.D. 307467  
Ross, Quinn & Ploppert, P.C.  
192 S. Hanover Street, Suite 101  
Pottstown, PA 19464  
Ph: (610) 323-5300  
F: (610) 323-6081

Dated: December 1, 2020